List of TCEAP Observations and Recommendations

General Management

Level 3

- The internal audit process is not being rigorously implemented for management of transportation.
- Procedure review is not being performed in a timely manner.

Level 4-5

- The total quality management (TQM) system prescribed by the Quality Assurance Program is not being implemented for management of transportation.

Hazardous and Radioactive Material Packaging

Level 2

- Off-site shipment of samples does not indicate management systems are in control of this activity.

Level 3

- The use of a generic drum closure instruction for drums from various drum suppliers is not authorized per 49 CFR 173.22(a)(4).

Level 4-5

- No system seems to be in place to meet the reporting requirements found in DOE Implementation Guide 460.2 (sections 6.2 - 6.3).
- The checklists that are referenced in several Transportation Safety procedures and found in Appendix B of the Transportation Safety Manual have no tracking numbers or revision numbers printed on them for document control.
- Type B casks are not identified as being out-of-service to prevent inadvertent use or perform the necessary maintenance as prescribed in the certificates of compliance to keep in continuous service.
- Ensure Price Anderson Amendment Act (PAAA) requirements are incorporated into the present packaging procurement procedures to ensure compliance.
- Closure instructions provided by the manufacturer should be followed to ensure a proper package seal is maintained for certification of the package in accordance with 49 CFR Part 178.

- Packages are not being properly maintained and stored to preclude degradation of the packaging.

Hazardous and Radioactive Material Shipper

Level 2

- Failure to incorporate current references and requirements in DOE Order 460.1A and 460.2 consistently in site procedures and Technical Manuals.

Level 3

- Inconsistent application of Department of Transportation Hazardous Materials Regulations (HMR).
- Information provided for shipping papers of hazardous material was not properly described to ascertain the proper shipping description.
- The review of the self-assessment revealed that the method used to determine a liquid or solid is not in accordance with 49 CFR §171.8.
- Additional information is in the basic description.
- The technical name or EPA waste code for a Hazardous Substance was not provided.
- The labpacks packing slips indicated fiber inner containers.

Level 4-5

- Incorrect DOT Proper Shipping Name, UN ID number, marking, and labeling of a waste lab-pack drum transported for disposal. This drum also lacked the name of the poison constituent listed in parentheses in association with the basic description.
- The “radioactive-empty package” shipment files contained Radiation Survey Logsheets (OSR 4-17A) with no column or defined area for internal contamination levels.
- Inability to demonstrate the requirement of DOE Order 460.2 for ensuring that shipments are inspected upon receipt for damage or loss and evidence of leakage.

Traffic Operations

Level 3

- Proper identification of U.S. Department of Energy on freight bills (“In care of” or “For the U.S. DOE”) for shipments consigned to the site.

Level 4-5

- The uniform tender numbers and carrier's tariff information are not recorded on the bills of lading for outbound truckload shipments.
- Procedures could not be found that address shipment consolidation or unnecessary detention and demurrage charges.
- The Traffic Operations Department is not maintaining an appropriate logging/filing system for all inbound and/or outbound shipments.
- Neither the Traffic Coordinator not the Materials Handlers had a copy of their policies and procedures readily available.
- The inbound documents do not utilize the notation "United States Department of Energy" or Contractor "for the United States Department of Energy."
- Inbound shipments are not selecting the preferred carriers or routing as Free On Board (FOB) origin to ensure control of lower transportation cost.

Motor Carrier Operations

Level 2

- Failure to implement a comprehensive Motor Carrier Program.
- The contractor was found to be operating as a motor carrier off-site in substantial non-compliance to the applicable sections of the Federal Motor Carrier Safety Regulations (FMCSR). There appears to be a lack of understanding of the Federal Motor Carrier requirements that govern these activities.

Level 3

- Failing to properly implement a program in which the motor carrier shall systematically inspect, repair and maintain all motor vehicles subject to their control.
- The evaluation process revealed that some confusion exists over which organization or group has the responsibility over drivers which are required to obtain a commercial drivers license (CDL), and who maintains these drivers qualification files, and ensures compliance.

Level 4-5

- Driver Qualification Files (DQF) contained test results for the required "Controlled Substances and Alcohol Use and Testing" per 49 CFR Part 382. These test results should not be in the DQF.

- Review the need for two DOT numbers on-site and number of CDL drivers in the drug and alcohol testing pool.
- The contractor uses GSA vehicles which are maintained in accordance with GSA policies and procedures, however, even though there exists a small number of "E" plated vehicles, the responsibility for maintenance rests on the organization or group who uses them, and is not consistently applied as is the GSA vehicles.

Railroad Operations

Level 3

- Single emergency response phone number of shipments of hazardous materials.

Level 4-5

- Potential incorrect ASTM Standard for Determination of Water (moisture) Content of Soil by the Microwave Oven Method (ASTM D 4643-93) per DOT regulations.

Transportation Emergency Response

Level 2

- The level of coordination for Transportation Emergency Response between Traffic Management, Waste Management, Emergency Management, and Security is fragmented and is not in regulatory compliance with 49 CFR 172.600.
- The level of coordination for Transportation Emergency Response between Traffic Management, Waste Management, Emergency Management and Security is fragmented and is not in compliance with 49 CFR 172.600. There is a lack of planning and coordination for emergency response among the Duty Officer, the shipping organization, and the third party emergency response 24-hour service provider. Procedures and responsibilities are not clearly understood by all groups.

Level 3

- The drill indicated a need for a better understanding of the procedures by the SPC operator. Current procedures do not indicate how the SPC knows when a shipment has reached its destination. Existing emergency procedures do not meet the requirements of 49 CFR 172.600 and there is no linkage with DOE Order 151.1 and site emergency plans and procedures.

Level 4-5

- The emergency response drill performed did not provide all the information requested by

the LEPC making the call in a timely manner. Review the call-up sheet to identify personnel who can best handle questions regarding the specific commodity being transported.

HAZMAT Employee Training

Level 2

- The contractor does not have a system in place to identify HAZMAT employees and to provide a status of the training. The recordkeeping for training is fragmented, with some groups not being able to locate their records.

Level 4-5

- Training requirements do not appear to be adequate for the specific job functions of some HAZMAT employees who are certified shippers of hazardous materials.
- The existing process for identifying HAZMAT employees and their recurrent training requirements appears inadequate. Evidence of employees not receiving the recurrent training in a timely manner was found.
- The recordkeeping process is fragmented, making it difficult to identify the actual level of employee training.

Recommendations

- Emphasis should be placed on assuring the quality and completeness of the Management Assessment Functions specified in the revised procedure MS-0010, Self Assessment of Requirements. (Reference: 10 CFR 830.120, Quality Assurance Requirements for Management Assessments).
- Management needs to review the packaging certification issues involving Shipping Container Systems Management Team (SCSMT) team member participation levels.
- 7A Type A package certification exemption from Department of Transportation (DOT) for use of Duct tape on package.
- Process for spot prices for truckload shipments needs to be more formalized.
- Time-line for Over, Short & Damage (OS&D) issues needs to be developed.
- Key individuals within maintenance and shipping should receive Commercial Vehicle Safety Alliance (CVSA) training.
- Table-top telephone emergency response drills similar to those that have been performed with railroads should be performed with motor carriers.
- Include checklist of required training courses for each employee in the employee training file to assist in “evaluations” performed by outside sources.
- Training staff review the Federal Registers to keep abreast of changing regulations.

- Suggest reviewing the procedures to assure they accurately reflect how the site maintains its records and conducts training.
- Implementing procedures should be reviewed to ensure accountability to personnel and organizations are traceable. In addition, procedures should be reviewed for continuity, including current revision references.
- Cognizant personnel should ensure that procurement documentation for packaging is maintained such that all applicable quality control aspects related to acceptance of packaging can be traced and evaluated. Performance requirements such as package testing, certification, and applicable analysis documentation should be maintained and readily available.
- In order to maintain an acceptable safety program the contractor should develop internal procedures and policies (i.e., Transportation Plan) for on-site and off-site operation of motor vehicles and commercial motor vehicles which will demonstrate an equivalent degree of safety.
- Recommend the development of procedures that are coordinated with the Emergency Management & Security, Traffic Division, and the Waste and Rad Groups, and the Duty Officers to define roles and responsibilities. Technical Points of Contact for different shipments should be identified and appropriate training on the Emergency Management Decisionmaking Process as it applies to off site transportation emergencies be provided. Procedures will need to be coordinated with CHEMTREC if contractor continues to use them as the third-party provider for 24-hour emergency response information.
- Recommend contractor set up "profiles" with CHEMTREC. This allows CHEMTREC to input comprehensive emergency response information with more specific, product-based information beyond that available to first on-scene responders in the NAERG into a database for easier access and more accurate information. The specific information includes flash point, toxicity data, boiling point, vapor density, specific gravity, solubility, miscibility, water reactivity, flammable limits, odor, physical state (gas, liquid, or solid), and detailed medical information. Contractor will need to establish procedures for providing assistance should CHEMTREC require additional specific information.
- Recommend the site maintain Carrier Emergency Response Plans and 24-hour points of contact. The 24-hour contact information should be provided to all parties involved, including CHEMTREC if contractor continues to use them.
- Contractor is currently working on procedures to address the deficiencies identified during this evaluation.
- Contractor should consider some additional training of the SPC operators, and they should conduct periodic notification drills.
- Contractor should obtain the emergency response plans (if available) from the carriers and have them available in the event of an incident.
- Contractor should assure a linkage with DOE Order 151.1 requirements.

- Everyone involved in the response phase should have a working knowledge of the NAERG.
- Implementation procedures should be approved and formally issued, especially if closure instructions for certain containers are a part of the procedure.
- Quality assurance verification should include assurances that proper packaging components are utilized and verified for proper use.
- Maintain packaging in areas free from potential weather damage (i.e., metal storage building near permitted hazardous waste storage facility).
- Give some serious consideration to the implementation of the I-ATMS for the contractor. This will enhance the overall traffic system and allow for better trending, ETAS reporting, freight bill auditing, shipment tracking, and interfaces with accounts payable.
- It is recommended that the site perform table top telephonic emergency response drills to test the 24-hour numbers. Also, the contractor needs to ensure that individuals are properly trained and are aware of the comprehensive information that may be required during an emergency.
- Currently, the training information from the Shipping and Receiving Department are not included in the Training Data Base. It is recommended their information be added so you have all HAZMAT employees listed in one data base.